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11  
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13 *Ultimate Fighting Championship and UFC*

14  
15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 Cung Le, Nathan Quarry, Jon Fitch,  
18 Brandon Vera, Luis Javier Vazquez,  
19 and Kyle Kingsbury on behalf of  
20 themselves and all others similarly  
situated,

21 Plaintiffs,

22 v.

23 Zuffa, LLC, d/b/a Ultimate Fighting  
24 Championship and UFC,

25 Defendant.

Case No.: 2:15-cv-01045-RFB-(BNW)

**DECLARATION OF WILLIAM A.  
ISAACSON IN SUPPORT OF  
ZUFFA, LLC'S RENEWED  
MOTIONS TO EXCLUDE THE  
TESTIMONY OF PLAINTIFFS'  
EXPERTS DR. HAL J. SINGER, DR.  
ANDREW ZIMBALIST, AND GUY  
A. DAVIS**

1 I, William A. Isaacson, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am  
 3 admitted *pro hac vice* to practice before this Court. I am a Partner in the law firm Paul, Weiss,  
 4 Rakoff, Wharton & Garrison LLP, counsel for Zuffa, LLC (“Zuffa”), in the above-captioned  
 5 action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-  
 6 01045-RFB-(BNW).

7 2. I make this declaration in support of Zuffa’s Defendant Zuffa, LLC’s Renewed  
 8 Motion to Exclude the Testimony of Plaintiffs’ Expert Guy A. Davis, Renewed Motion to Exclude  
 9 the Testimony of Dr. Andrew Zimbalist, and Renewed Motion To Exclude Certain Opinions of  
 10 Dr. Hal J. Singer (the “Motions”).

11 3. Based on my review of the files, records, and communications in this case, I have  
 12 personal knowledge of the facts set forth in this Declaration and, if called to testify, could and  
 13 would testify competently to those facts under oath.

14 4. Certain documents attached to this Declaration have had red boxes or yellow  
 15 highlighting added to them. These markings are intended to indicate materials cited in the Motions  
 16 referenced above. The true and correct copies of materials attached to this Declaration are subject  
 17 to the addition of those markings. They are otherwise unmodified unless otherwise stated.

18 5. Attached as Exhibit 1 is a true and correct copy of the expert opening report of Guy  
 19 A. Davis, dated August 31, 2017, redacted to remove personal identifiable information.

20 6. Attached as Exhibit 2 is a true and correct copy of excerpted pages from the  
 21 transcript of the first deposition of Guy A. Davis, dated September 19, 2017.

22 7. Attached as Exhibit 3 is a true and correct copy of the expert “rebuttal” report of  
 23 Guy A. Davis, dated January 12, 2018, redacted to remove personal identifiable information.

24 8. Attached as Exhibit 4 is a true and correct copy of excerpted pages from the  
 25 transcript of the second deposition of Guy A. Davis, dated January 30, 2018.

26 9. Attached as Exhibit 5 is a true and correct copy of the expert opposition report of  
 27 Zuffa’s expert Elizabeth Kroger Davis, dated October 27, 2017, redacted to remove personal

1 identifiable information.

2       10. Attached hereto as Exhibit 6 is a true and correct copy of the Expert Report of  
 3 Andrew Zimbalist dated August 30, 2017, redacted to remove personal identifiable information.

4       11. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the first  
 5 deposition of Andrew Zimbalist dated September 25, 2017.

6       12. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of Herbert  
 7 Hovenkamp, *Federal Antitrust Policy* (2nd ed. 1999).

8       13. Attached hereto as Exhibit 9 is a true and correct copy of the Errata to the Expert  
 9 Report of Andrew Zimbalist dated September 19, 2017.

10       14. Attached hereto as Exhibit 10 is a true and correct copy of the Expert Rebuttal  
 11 Report of Andrew Zimbalist dated December 26, 2017.

12       15. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of Daniel  
 13 Rubinfeld, *Research Handbook on the Economics of Antitrust Law* dated November 21, 2009.

14       16. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of Phillip  
 15 Areeda, Herbert Hovenkamp, Roger D. Blair, & Christine Piette Durrance, *Antitrust Law* (4<sup>th</sup> ed.  
 16 2014), Volume IIA.

17       17. Attached hereto as Exhibit 13 is a true and correct copy of the Expert Report of  
 18 Roger D. Blair dated November 15, 2017, redacted to remove personal identifiable information.

19       18. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the second  
 20 deposition of Andrew Zimbalist dated January 26, 2018.

21       19. Attached hereto as Exhibit 15 is a true and correct copy of Andrew Zimbalist,  
 22 *There's more than meets the eye in determining players' salary shares*, Sports Business Journal,  
 23 dated March 10, 2008.

24       20. Attached hereto as Exhibit 16 is a true and correct copy of GBP000001 (Golden  
 25 Boy Promotions Profit & Loss - 2015).

26       21. Attached hereto as Exhibit 17 is a true and correct copy of GBP000002 (Golden  
 27 Boy Promotions Profit & Loss - 2016).

1       22. Attached hereto as Exhibit 18 is a true and correct copy of Exhibit 3 to the  
 2 Sbardellati Declaration filed in support of Defendants' Motion in Limine to Exclude Testimony of  
 3 Gene Deetz in *Golden Boy Promotions LLC v. Haymon*, Case No. 15-cv-3378, ECF No. 322-14  
 4 (Jan. 6, 2017), identified as backup to Table 2 in the Expert Report of Andrew Zimbalist and Table  
 5 2-E in the Errata to the Expert Report of Andrew Zimbalist.

6       23. Attached hereto as Exhibit 19 is a true and correct copy of an Order, ECF No. 457,  
 7 issued in *In re Google Play Store Antitrust Litigation*, No. 20-cv-5761 (N.D. Cal.), on September  
 8 13, 2023.

9       24. Attached hereto as Exhibit 20 is a true and correct copy of an April 24, 2023 Letter  
 10 issued by the United States Supreme Court.

11       25. Attached hereto as Exhibit 21 is a true and correct copy of the Expert Report of  
 12 Robert H. Topel, dated October 27, 2017.

13       26. Attached hereto as Exhibit 22 is a true and correct copy of Robert H. Topel's Reply  
 14 to the Supplemental Expert Report of Hal J. Singer, dated May 7, 2018.

15       27. Attached hereto as Exhibit 23 is a true and correct copy of the Expert Report of  
 16 Paul Oyer, dated October 27, 2017.

17       28. Attached hereto as Exhibit 24 is a true and correct copy of the Expert Report of Hal  
 18 J. Singer, dated Aug. 31, 2017. This exhibit has redactions due to the clawback of the redacted  
 19 information by non-party Deutsche Bank on the basis of privilege. *See* ECF No. 727.

20       29. Attached hereto as Exhibit 25 is a true and correct copy of the Supplemental Expert  
 21 Report of Hal J. Singer, dated April 3, 2018.

22       30. Attached hereto as Exhibit 26 is a true and correct copy of excerpts of the first  
 23 deposition of Hal J. Singer, dated September 27, 2017.

24       31. Attached hereto as Exhibit 27 is a true and correct copy of the Declaration of  
 25 Gregory K. Leonard, dated December 1, 2023.

26       32. Attached hereto as Exhibit 28 is a true and correct copy of online search results of  
 27 SCImago Journal & Country Rank,

<https://www.scimagojr.com/journalsearch.php?q=journal+of+business+and+economics> (last visited November 30, 2023).

33. Attached hereto as Exhibit 29 is a true and correct copy of WorldCat's online library-listing search results for the Journal of Business and Economics (last visited Dec. 1, 2023), <https://search.worldcat.org/title/953673111>.

34. Attached hereto as Exhibit 30 is a true and correct copy of the FAQ section of the Academic Star Publishing webpage (last visited Nov. 30, 2023),  
<http://www.academicstar.us/ArticleShow.asp?ArtID=378>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 8th day of December 2023 in Washington, D.C.

/s/ William A. Isaacson  
William A. Isaacson